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REPLY TO FREEHOLD

July 28, 2025

VIA UPS DELIVERY

Honorable Claire C. Cecchi, U.S.D.J.
Courtroom MLK 5B
Martin Luther King Building & U.S. Courthouse
50 Walnut Street
Newark, New Jersey 07101

**Re: Trainor, et al v. McGibney,
Civil Action No. 2:24-cv-08873 (CCC)(MAH)**

Dear Judge Cecchi:

We represent Defendant James McGibney a/k/a Instagram Account @bullyville and X Account @realbullyville (“Defendant” or “McGibney”) in connection with the above-referenced matter. Insofar as the Exhibits submitted exceed fifty (50) pages, enclosed herewith are courtesy copies of (1) the July 28, 2025 Reply Brief and (2) Declaration of Mr. McGibney filed in response to Plaintiffs’ Opposition to Mr. McGibney’s pending Motion to Dismiss the Amended Complaint (Document No. 24). This motion is currently returnable before Your Honor on Monday, August 4, 2025.

While we understand the preference of the Court to dispense with oral argument and rule on the papers, in light of the numerous inaccuracies between the allegations in the Amended Complaint and the actual internet posts referenced in the Amended Complaint in connection with

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the allegations of libel, defamation and slander, we respectfully submit that it may be useful for counsel for Plaintiff to explain how the actual posts support such claims.

Thank You for Your time and attention to this matter. By copy of this letter sent via ECF and email only, we are advising adversary counsel of the above, .

Respectfully submitted,

/s/ Gregg S. Sodini

GREGG S. SODINI

Enclosures

cc: Patrick Trainor, Esq. (via ECF and email only pt@ptesq.com)